

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

GRACE LAWRENCE  <div style="text-align: right;">Plaintiff,</div> <div style="text-align: center;">v.</div> TRANS UNION LLC CITY OF PHILADELPHIA <div style="text-align: right;">Defendant.</div>	C.A. NO: 02-CV-4440
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**JOINT MOTION FOR EXTENSION OF TIME**

Trans Union LLC (“Trans Union”), and Grace Lawrence (“Plaintiff”) (collectively referred to as the “Parties”), by and through their undersigned attorneys, jointly move for an extension of time of all deadlines for sixty (60) days.

1. Plaintiff has commenced this action alleging that Defendant Trans Union violated the Fair Credit Reporting Act, 15 U.S.C. §1681 *et seq.* (the “FCRA”) because it reported certain allegedly inaccurate credit information relating to Plaintiff.

2. The Parties have engaged in serious settlement discussions. The City of Philadelphia is being dismissed as a defendant.

3. A settlement conference was scheduled to take place on Wednesday, March 12, 2003. However, based on the parties’ discussions, it appears that this conference would not be productive. There are unresolved issues that will require third-party discovery, and additional discovery between the parties.

4. Accordingly, the Parties respectfully requests that the Scheduling Order be modified to extend all existing deadlines for sixty (60) days.

5. This extension of time is sought in the interests of justice, and will not interfere with any other date scheduled by this Court’s Scheduling Order.

WHEREFORE, the Parties jointly respectfully request that this Court grant an extension of time of all existing deadlines for sixty (60) days.

Respectfully Submitted this 14<sup>th</sup> day of March, 2003

*By/S/TPC w/ express permission*

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